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Attorneys for Defendant
Amber Fryer

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EUGENE COINS, JR.,

Plaintiff,

v.

FRYE, et al.,

Defendants.

Case No. 3:17-cv-00090-MMD-CBC

**MOTION FOR EXTENSION OF TIME TO
SERVE DISCOVERY RESPONSES TO
PLAINTIFF'S INTERROGATORIES
(SET ONE) (First Request)**

Defendant, Amber Fryer, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Dennis W. Hough, Deputy Attorney General, hereby submit this Motion for Extension of Time to Serve Discovery Responses to Plaintiff's Interrogatories, set one, (First Request). This Motion is based on Federal Rule of Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and pleadings on file in this action.

MEMORANDUM OF POINTS AND AUTHORITIES

I. ARGUMENT

Defendant respectfully requests a fourteen (14) day extension of time out from the current deadline of August 21, 2019, to serve responses to Plaintiff's Interrogatories, set one, in this case. Counsel for Defendant is confronted with numerous competing deadlines and a high workload due to staffing changes in the Office of the Attorney General.

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1 However, such obstacles are currently being resolved and the requested extension of time should afford
2 Defendant adequate time to serve discovery responses in this case.

3 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

4 When an act may or must be done within a specified time, the court may, for
5 good cause, extend the time: (A) with or without motion or notice if the court
6 acts, or if a request is made, before the original time or its extension expires; or
7 (B) on motion made after the time has expired if the party failed to act because of
8 excusable neglect.


9 Defendant's request is timely and its limited nature will not hinder or prejudice Plaintiff's case, but will
10 allow for thorough responses to Plaintiff's discovery requests. The requested fourteen (14) day
11 extension of time should permit Defendant time to adequately research and respond to Plaintiff's
12 discovery requests. Defendant asserts that the requisite good cause is present to warrant the requested
13 extension of time.

14 For these reasons, Defendant respectfully requests a fourteen (14) day extension of time from
15 the current deadline to serve discovery responses in this case, with a new deadline to and including
16 Wednesday, September 4, 2019.


17 DATED this 21st day of August 2019.

18 AARON D. FORD
19 Attorney General

20 By:

21 
22 DENNIS W. HOUGH
23 Deputy Attorney General

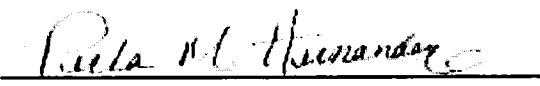
24 *Attorneys for Defendants*

25 IT IS SO ORDERED
26 
27 U.S. MAGISTRATE JUDGE
28 DATED: 8/22/2019

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 21st day of August, 2019, I caused to be deposited for mailing a true and correct copy of the foregoing, **MOTION FOR EXTENSION OF TIME TO SERVE DISCOVERY RESPONSES TO PLAINTIFF'S INTERROGATORIES (SET ONE) (First Request)**, to the following:

Eugene Coins, #87350
Warm Springs Correctional Center
P.O. Box 7007
Carson City, NV 89702


An employee of the
Office of the Attorney General